IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

BRENNAN M. GILMORE,

Plaintiff,

V.

No. 3:18-cv-00017-NKM-JCH

ALEXANDER E. (ALEX) JONES, et al.,

Defendants.

STIPULATION AND ORDER

WHEREAS, Plaintiff Brennan Gilmore ("Gilmore") sued Defendants Michele Hickford ("Hickford") and Words-N-Ideas, LLC ("WNI") for defamation in connection with WNI's publication of "BOMBSHELL: New evidence suggests Charlottesville was a complete SET-UP" (the "WNI Publication") on August 19, 2017;

WHEREAS, the WNI Publication contained a republication with language pertaining to Gilmore and the August 2017 Unite the Right rally;

WHEREAS, WNI, when it relied upon its source, had no evidence that Gilmore was involved in a set up or in any other way with the August 2017 Unite the Right rally in Charlottesville and the terrorist attack that killed Heather Heyer;

WHEREAS, Hickford and WNI do not contest Gilmore's allegation of defamation;

WHEREAS, the parties desire to amicably resolve all claims arising out of this action;

WHEREAS, in lieu of damages, Hickford and WNI agree to make a joint charitable donation of two thousand five hundred dollars (\$2,500) to the Legal Aid Justice Center;

WHEREAS, Gilmore, Hickford, and WNI, having entered into a settlement agreement, hereby stipulate to the entry of an order in this action, as follows:

IT IS ORDERED, ADJUDGED, AND DECREED as follows:

- 1. This Court has jurisdiction over the subject matter of the above action and has personal jurisdiction over the parties for purposes of this action and as set forth in Paragraph 4 below.
 - 2. Hickford admits liability for the claims asserted by Gilmore in this action.
 - 3. WNI admits liability for the claims asserted by Gilmore in this action.
- 4. As a condition of settlement, Hickford and WNI have agreed to make a joint charitable donation of two thousand five hundred dollars (\$2,500) to the Legal Aid Justice Center.
- 5. The parties agree that this Court will retain jurisdiction to enforce the terms of the parties' settlement agreement and to enforce and resolve any disputes related thereto, if necessary.
- 6. This action and all defenses thereto are hereby dismissed with prejudice and without costs, disbursements, or attorneys' fees to any party.

/s/ Hassen A. Saveed

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/s/ Mia Yugo

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Attorneys for Plaintiff

SO ORDERED this 25th day of June , 2021.

NORMAN K. MOON

SENIOR UNITED STATES DISTRICT JUDGE